Jarvis Law Associates, P.C. Roland B. Jarvis, Esquire Identification No. 65647 1528 Walnut Street, Suite 1401 Philadelphia, PA 19102 (215) 313.5684/(215) 887.8205fax

ATTORNEY FOR DEFENDANT

## IN THE UNITED STATES DISTRICT COURT

## FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**UNITED STATES of AMERICA** 

ν.

ASKIA WASHINGTON,

Defendant

CRIMINAL NO: 13-00171-02

Honorable Joel H. Slomsky

## COUNSEL'S MOTION FOR LEAVE TO WITHDRAW

COMES NOW Roland B. Jarvis, Esquire, and moves this Honorable Court for leave of Court to withdraw his representation in the captioned case pursuant Mr. Washington's Pro Se motion for reconsideration and in support of said motion states the following:

1. On or about April 11, 2013, defendant was charged in a six-count Indictment with conspiracy to commit Hobbs Act Robbery (Count I), aiding and abetting Hobbs Act Robbery (Count II), conspiracy to possession with intent to distribute five kilograms of cocaine (Count III), aiding and abetting the knowing and intentional possession of five kilograms of cocaine (Count IV), knowingly carrying and aiding and abetting the carrying of firearms (Count V) and felon in possession of firearms (Count VI).

- 2. On or about July 7, 2104, Mr. Washington filed a motion and announced that his attorney had abandoned him and his defense.
- 3. Undersigned counsel may not have been able to visit Mr. Washington at the FDC Philadelphia following this Court's Order denying the pre-trial motions, however, he did not a abandoned Mr. Washington or his case.
- 4. Nonetheless, under the circumstances, and given the fact that trial is scheduled for September 2014, undersigned counsel submits that a material breach in confidence has occurred which prevents him from continuing as counsel.
- 5. Furthermore, out of an abundance of caution and for reasons that are most appropriately characterized as "irreconcilable differences or conflict of interests," undersigned counsel must respectfully—and urgently—request leave of Court to withdraw his appearance from this matter.
- 6. Finally, undersigned counsel does not make this request lightly; indeed, it comes only after studied consideration of various circumstances and indepth consultation with both federal and state court practitioners.

WHEREFORE, undersigned counsel respectfully requests this Court to grant his motion and to allow him to withdraw from all further representation of Mr. Washington in this case.

Respectfully submitted,
JARVIS LAW ASSOCIATES, P.C.
By:
s/Roland B. Jarvis
Roland B. Jarvis, Esquire

## **CERTIFICATE OF SERVICE**

I, Roland B. Jarvis, hereby certify that a true and exact copy of the enclosed Motion for Withdrawal of Appearance was served upon the below listed parties via first class mail, postage paid, or Electronic Case Filing.

Salvatore Astolfi, Esquire Assistant U.S. Attorney United States Attorney's Office 615 Chestnut Street, Suite 1250 Philadelphia, PA 19106

> AskiaWashington Inmate No. 69032-066 FDC - Philadelphia 700 Arch Street P.O. Box 562 Philadelphia, PA 19105

> > /s/ Roland B. Jarvis
> > Roland B. Jarvis